



September 3, 2010

Office of the Secretary
Federal Communications Commission,
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 10-119

Dear Docket Clerk:

On behalf of the more than 1,500 member organizations of the American Public Transportation Association (APTA), I write to provide comments on the Federal Communication Commission's (FCC) Review of Personal Radio Services Rules, announced August 4, 2010, at 75 FR 47142.

About APTA

APTA is a non-profit international trade association of more than 1,500 public and private member organizations, including public transit systems; high-speed intercity passenger rail agencies; planning, design, construction and finance firms; product and service providers; academic institutions; and state associations and departments of transportation. More than ninety percent of Americans who use public transportation are served by APTA member transit systems.

Support of the Metropolitan Transportation Authority

APTA endorses and supports the request of the New York Metropolitan Transportation Authority (MTA) that the FCC set aside spectrum for MTA's use in Positive Train Control (PTC) systems.

As noted both by the MTA and the Association of American Railroads (AAR), PTC implementation must be complete by December 31, 2015 under the provisions of the Rail Safety Improvement Act of 2008. PTC will require extensive communications infrastructure and interoperability with freight railroads. With the AAR and its member railroads identification of the 220-222 MHz band as suitable for PTC deployment, it is imperative that the Commission set aside spectrum in the 218-219 MHz band to provide the required interoperability.

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William Millar

We appreciate the opportunity to assist the Commission in this important endeavor. For additional information, please contact James LaRusch, APTA's chief counsel and vice president corporate affairs, at (202) 496-4808 or jlarsch@apta.com.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "William Millar", with a stylized flourish at the end.

William Millar

WM/rk